



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

0000018

JUN 11 1998

MEMORANDUM

REPLY TO THE ATTENTION OF:

SUBJECT: **ACTION MEMORANDUM**-Determination of Threat to Public Health and the Environment at the GHR Foundry Site, Dayton, Montgomery County, Ohio (Site ID# A539)

FROM: *for* Paul R. Steadman, On-Scene Coordinator
Emergency Response Branch, Section III *Frank Rollins*

TO: William E. Muno, Director
Superfund Division

EPA Region 5 Records Ctr.



247443

I. PURPOSE

The purpose of this Memorandum is to document the determination of an imminent and substantial threat to public health, welfare and the environment from the conditions identified at the GHR Foundry Site (GHR) located on 400 Detrick Street in Dayton, Montgomery County, Ohio. Hazardous substances found at the site include polychlorinated biphenyls (PCBs), asbestos, volatile organic compounds and metals.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # OHDO99020133

The response action proposed herein will mitigate site conditions through site disposal. Foundry Sales & Supply, a Potentially Responsible Party (PRP), signed an Administrative Order on Consent, U.S. EPA Docket No. ZW97-G388.

A. Site Description

1. Removal site evaluation

The GHR Foundry site is an approximately 12 acre site which was formerly operated as a grey iron castings foundry from at least 1946 until early in the year 1983. The site is not on the National Priorities List (NPL).

The Site represents a serious air, land, ground, and surface waterway contamination hazard as a result of uncontrolled disposal of PCBs within and throughout the site during salvaging operations for copper and other recyclable or reusable scrap metals from large electrical transformers and capacitors.

Sources of the PCB contamination may be from approximately 18 electrical transformers located throughout the site with capacities ranging from 181 gallons to 465 gallons.

Other materials deposited and remaining on this site include four underground storage tanks (USTs) with capacities ranging from 3,000 gallons to 20,000 gallons and known to contain kerosene, fuel oil and "core oil", at least fifteen (15) probable propane gas containing cylinders, two melting cupolas with associated filter systems containing dust, high capacity gasoline containers, demolition and construction debris, and varied recyclable metal wastes as well as varying amounts of mixed solid waste.

The need for a time-critical removal action at the GHR Site was first recognized during this Agency's response to a request for assistance from the Ohio Environmental Protection Agency (OEPA) dated March 20, 1996 and received on April 3, 1996. A site removal assessment investigation in response to that request was conducted on April 10, 1996. During the conduct of this site assessment investigation by the U.S. EPA OSC and the Superfund Technical Assistant Response Team (START) contractor, Ecology and Environment, several soil, sediment and liquid samples were collected to better characterize or identify this site's potential hazardous constituent profile.

The contaminants found at the GHR Foundry Site all pose an inhalation and direct contact hazard to persons who would enter or come near the site, and the gasoline containers, propane cylinders, and the UST contents pose a serious fire and potential explosion hazard.

2. Physical location

The GHR Foundry Site is located off Detrick Street in the northwestern area of Dayton, Ohio. The property boundaries are within the following coordinates: 39 46' 10" North and 86 10' 48" West.

The resident population of Dayton, Ohio approaches 206,000. Environmental justice considerations from the landview model decision matrix indicate that category 1 or low income and high minority groups are residing within less than a one mile radius of this site, especially at points to the northwest and immediately south from the site. Higher concentrations of the category 3 low income/low minority group are shown to reside in neighborhoods immediately surrounding the site. The median annual household income is reported to be \$13,496 compared to the nationally established poverty income level of \$29,500 per year for a family of four, based on a count of 4363 households for the area with a number of 10,757 persons counted during the 1990 Census. Of that number 9300 are identified ethnically as white, 1317 or 12.2% as Black,

about four-tenths of 1% (0.42%) are identified as Native American, and 74 or less than seven-tenths (0.68%) of one percent of the total are identified as Asian.

3. Site characteristics

The site is relatively flat with moderate escarpment along the Mad River on the north side of the site where it gradually tapers to the height of the prevailing topography within its remaining acreage. Soil types vary widely across the site. Inadequate access restriction to the site affords vehicles, individuals and wildlife uninhibited entry to the site area.

4. Release or threatened release into the environment of the hazardous substance, or pollutant or contaminant

The existing data base indicates that the primary potential contaminants associated with the GHR Foundry Site are PCBs, asbestos, and possibly some semi-volatile and volatile organic chemical compounds pending determination of the UST location and contents.

B. Other Actions to Date

1. Previous Actions

In June of 1991, the OEPA conducted a PCB compliance inspection of the GHR Foundry Site. It is apparent from the record that this inspection was conducted in an attempt to identify potentially responsible parties, namely the Ohio Industrial Trading Company and John Paul Enterprises. There were no further compliance related activities performed relative to toxic materials located at or stored upon this site.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES.

CERCLA and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) 40 CFR Part 300.415, Paragraph (b) (2), as amended, lists factors to be considered when determining the appropriateness of a potential removal action at a site which is reasonable and necessary to protect public health, welfare, and the environment.

The following discussion presents a summary of those factors which are applicable to the GHR Site:

a. Actual or potential exposure to hazardous substances by nearby populations, animals, or the foodchain;

This factor exists at the GHR Site due to the presence of large quantities of PCBs, asbestos in a friable and releasable condition, and other hazardous substances detected within the site area where no controls are in place to prevent their migration from the site into adjacent areas.

Also there is evidence of at least one primary receptor, an apparent homeless person who is squatting within the site at a location direct and immediate to the contaminants, and there is evidence of small animal burrowing and harborage within the site area which puts such wildlife at risk of exposure to hazardous substance located at this facility.

b. Actual and potential further contamination of drinking water supplies or sensitive ecosystems;

This factor exists at the GHR site due to the presence of contaminants including PCBs, potentially volatile organic chemical compounds stored in UST's, and asbestos containing debris which are located on this site at a distance of no more than 150 feet from the Mad River which has been identified as a drinking water source to the residents of Dayton, Ohio.

c. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

This factor exist at the GHR site due to the presence of PCBs at approximately 50 ppm in the soils located on the southeast and central area of this site. There are no containment measures in place to prevent contaminated soil migration.

d. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or to be released;

This factor exist at the site due to the presence of contaminated surface soils which are largely permeable allowing uninhibited infiltration of rainfall which is estimated to fall over the site area at an annual rate of 32.3 inches per year. In addition, mean annual velocity of winds in the area are reported to be between 6.9 and 11.7 miles per hour. These factors contribute to the potential for wind and waterborne transport of asbestos to surrounding areas as well as erosion of the soils over time which would expose these contaminants and potentially pose a threat to human health and the environment.

e. Other situations or factors which may pose threats to public health or welfare or the environment;

This factor exists at the site due to lack of adequate site access controls. There are no warnings or other means to prevent public access to the site area.

IV. ENDANGERMENT FINDINGS

Given the site conditions where PCBs, gas, asbestos, volatile organic chemicals, and heavy metals exist on this site, the nature of these hazardous substances on the site, and the potential exposure pathways to nearby population described in Sections II and III above, actual or threatened releases of hazardous substances from this site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare and the environment.

Given the site conditions, the nature of the hazardous substances present on-site, the potential exposure pathways to nearby populations described above, and the actual or threatened releases of hazardous substances from the site, if not completely addressed by the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health or welfare and the environment.

V. PROPOSED ACTIONS AND PROJECTED TIME LINES

A. Removal activities to be performed at the site include the following tasks:

1. Develop a sampling plan using appropriate quality assurance and quality control data validation procedures which are acceptable for Level 2 data quality objectives for identification of all known and potential contamination upon this site.
2. Implement site safety and health plan, an air monitoring program and the sampling and analysis plan.
3. Provide for access control of the general public to this site and the entire facility until these tasks are completed and this site is determined to be free of hazardous materials and/or substances contamination.
4. Obtain facility layout detail or drawings from the Montgomery County Recorder of Deeds Offices for purposes to determine the location of USTs which may contain PCBs or volatile organic compounds which are listed as being on this site. Alternatively, employ GPR and/or geoprobe apparatus to determine their location and contents of USTs, and provide for the contents removal, shipment, and disposal.

5. Access the on-site building where friable asbestos materials are found and noted on the floor and throughout this structure. Remove asbestos containing materials, containerize them, and provide for appropriate off-site disposal.
6. Access the interior of all buildings and structures for electrical transformers, capacitors and like or associated appurtenances located on this site for purposes of removing residual PCB contents, containerize these materials, and dispose off-site.
7. Access the on-site building where large quantities of labeled PCB containers and asbestos labeled bags are stored, sample the contents of each container and bag, tabulate the sampling data for U.S. EPA's inspection, and off-site dispose.

The response actions described in this memorandum directly address actual or threatened release of hazardous substances, pollutants or contaminants at this facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not pose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

B. Applicable or relevant and appropriate requirements (ARARs)

Federal ARARs including the U.S. EPA PCB Spill policy, asbestos removal under NESHAPS requirements, and applicable UST program requirements shall be met. As well all ARARs associated with state and local statutes or administration codes will be complied with to the extent practicable. A letter has been received from the Ohio Environmental Protection Agency (OEPA) in response to this Branch's request for identification on ARARs. Ohio State ARARs identified include spills of oil and other objectionable substances, response to leaks or spills and disposition of leaking or unfit-for-use tank systems, fugitive dust emission, disposal of special waste, disposal of hazardous waste, drum removals requisites, safety and personal protection, and ambient air quality standards for prevention of significant deterioration in nonattainment areas of this state. All ARARs which have been identified in a timely manner for this removal action will be complied with to the extent fiscally practicable. All disposal activities will be conducted in accordance with the U.S. EPA Off-Site Rule 40 CFR Section 300.440, 58 Federal Register 49215 (September 22, 1993).

The Montgomery County Health Department (MCHD) seeks in its ARARs that site access restrictions around the site be addressed or that conspicuous posting of precautionary signs to warn the public of potential dangers found on the site.

C. Projected schedule

On the matter of post-removal site control (PRSC) according to Section 300.415 (1) of the NCP, the On-Scene-Coordinator has begun planning for provision of post-removal site control.

Currently, the PRSC mechanism to be used will be based on the County of Montgomery's and the city of Dayton's long-term objectives for this facility because it is located within these jurisdictional boundaries of these entities.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN.

The GHR Foundry Site will remain as an immediate and continuing threat to public health, welfare and the environment should no action be taken to remove the risks identified and associated with this Site. Moreover, any Brownfields initiatives planned or scheduled for this property location may be seriously delayed for implementation and perhaps even truncated should the proposed actions for this removal not be taken forthwith.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for the GHR Foundry Site is contained in an Enforcement Confidential Addendum.

VIII. RECOMMENDATION

This decision document represents the selected removal action for the GHR Foundry Site in Dayton, Montgomery County, Ohio developed in accordance with CERCLA as amended, and in accordance with the NCP. This decision is based on the Administrative Record for the site (Attachment I). Conditions at the site meet Section 300.415(b) (2) of the NCP criteria for a removal and I recommend your approval of the proposed removal action. Please indicate your decision by endorsement below.

APPROVE:

Richard Karl for DATE: 6-11-98
Director, Superfund Division

DISAPPROVE:

Director, Superfund Division

cc:

K. Mould, U.S. EPA HQ, 5202-G
D. Henne, U.S. Department of Interior (w/o Enforcement Addendum)
K. Clouse, OEPA, ERSIS/DERR, (w/o Enforcement Addendum)
D. Schregardus, Director, OEPA, (w/o Enforcement Addendum)

PAGE 8
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HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ENFORCEMENT CONFIDENTIAL ADDENDUM
GHR FOUNDRY SITE
JUNE 11,1998
2 PAGES

HAS BEEN REDACTED

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION

ATTACHMENT J

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTIONADMINISTRATIVE RECORD
FOR
GHR FOUNDRY SITE
DAYTON, MONTGOMERY COUNTY, OHIOORIGINAL
JANUARY 16, 1998

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	00/00/00	U.S. EPA	File	Addressee and Contact List for the GHR Foundry Site	2
2	12/00/90	IDEM	Public	Fact Sheet: PCB's: Polychlorinated Bi-phenyls	2
3	05/30/91	Steele, A., City of Dayton/ Department of Fire	Buchan, T., Ohio EPA	Letter re: City of Dayton Fire Department's April 30, 1991 Inspection of the GHR Foundry Complex	2
4	06/17/91	Ohio EPA	U.S. EPA	Report on Inspection to Determine Compliance with the PCB Disposal and Marking Regulations at the GHR Foundry Site	62
5	06/27/91	U.S. EPA	File	TSCA (PCB) Tracking System Input Document for Inspections re: the June 17, 1991 Inspection at the GHR Foundry Site	6
6	07/01/91	Nemore, G., Ohio EPA	Carcione, R.	Letter re: July 1, 1991 OEPA Inspection at John Paul Enterprises	1
7	06/09/93	Buchan, T., Ohio EPA	Moore, K., U.S. EPA	Memorandum re: June 17, 1991 PCB Inspection at the GHR Foundry Site	2
8	11/03/94	Weems, D., Ohio EPA	Cooper, S., U.S. EPA	Memorandum Forwarding Attached Drafts of the GHR Foundry/John Paul Enterprises Concurrence Requests (ATTACHMENTS CONTAINED ON 3.5" DISK)	1

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9	07/01/95	Code of Federal Regulations		40 CFR Ch. 1, Part 22: Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits	12
10	12/08/95	Niedergang, N., U.S. EPA	Kirkland, J., Registered Agent/John Paul Enter- prises, Inc. and R. Carcione, Ohio Industrial Trading Company	Complaint and Notice of Opportunity for Hearing re: John Paul Enterprises and Ohio Industrial Trading Company w/Cover Letters	34
11	03/20/96	Clouse, K., Ohio EPA	El-Zein, J., U.S. EPA	Letter re: OEPA's Request for U.S. EPA Assistance in Conducting a Removal Action at the former GHR Foundry Site	1
12	04/03/96	Rollins, F., U.S. EPA	Steadman, P., U.S. EPA	Site Assignment re: the GHR Foundry Site	1
13	04/11/96	U.S. EPA	Ecology and Environment, Inc.	Technical Direction Document re: Site Assessment for the GHR Foundry Site	2
14	05/03/96	U.S. EPA	Respondents	First Amended Complaint and Notice of Opportunity for Hearing re: the Ohio Industrial Trading Company, John Paul Enter- prises, Inc. and Foundry Sales & Supply, Inc.	33
15	05/10/96	Niedergang, N., U.S. EPA	2112 East Ohio Service Corporation/ Registered Agent for Foundry Sales & Supply, Inc.	Letter Forwarding the First Amended Complaint and Notice of Opportunity for Hearing re: the Ohio Industrial Trading Company, et al.	2

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16	05/10/96	Niedergang, N., U.S. EPA	Kirkland, J., Registered Agent/John Paul Enterprises, Inc.	Letter Forwarding the First Amended Complaint and Notice of Opportunity for Hearing re: the Ohio Industrial Trading Company, et al.	2
17	05/10/96	Niedergang, N., U.S. EPA	Ohio Industrial Trading Company	Letter Forwarding the First Amended Complaint and Notice of Opportunity for Hearing re: the Ohio Industrial Trading Company, et al.	2
18	05/31/96	Bulloff, A.; Kadish, Hinkel & Weibel	U.S. EPA	Letter Forwarding Attached Answer of Respondent Foundry Sales & Supply, Inc. to First Amended Complaint and Notice of Opportunity for Hearing re: the Ohio Industrial Trading Company, et al.	9
19	06/06/96	Chapman, T., U.S. EPA	Respondents	Notice of Filing and Proof of Service re: First Amended Complaint and Notice of Opportunity for Hearing in the Matter of Ohio Industrial Trading Company, et al.	5
20	07/10/96	Steadman, P., U.S. EPA	Clouse, K., Ohio EPA	Letter re: U.S. EPA's Request for OEPA Information Concerning the GHR Foundry Site	4
21	07/19/96	Wilder, I., Ohio EPA	Steadman, P., U.S. EPA	Letter re: OEPA's Response to U.S. EPA's Request for Information Concerning the GHR Foundry Site	2
22	08/13/96	Steadman, P., U.S. EPA	U.S. EPA	Region 5 RISE Information Form re: GHR Foundry Site	1
23	08/14/96	Ecology and Environment, Inc.	U.S. EPA	Site Location Map for the GHR Foundry Site	1

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24	08/14/96	Ecology and Environment, Inc.	U.S. EPA	Site Features and Sample Location Map for the GHR Foundry Site.	1
25	08/26/96	Ecology and Environment, Inc.	U.S. EPA	Site Assessment Report for the GHR Foundry Site	47
26	09/11/96	Karl, R., U.S. EPA	Addressees	Letter re: General Notice of Potential Liability for the GHR Foundry Site w/Attached List of PRPs Receiving the General Notice Letter	5
27	10/15/96	U.S. EPA	Ecology and Environment, Inc.	Technical Direction Document re: Analytical for the GHR Foundry Site	2
28	11/18/96	Bartley, J., Roy F. Weston, Inc.	Carcione, R., Foundry Sales & Supply, Inc.	Letter re: Weston's Proposal to Provide Environmental Consulting Services	8
29	12/23/96	Lueck, L. and T. Kouris; Ecology and Environment, Inc.	Nabasny, G., U.S. EPA	Letter re: Drum Sampling at the GHR Foundry Site	12
30	01/21/97	U.S. EPA	File	Outline of Remedial Project Activities for the GHR Foundry Site	1
31	01/21/97	Bartley, J., Roy F. Weston, Inc.	Carcione, R., Foundry Sales & Supply, Inc.	Letter re: Amendment #2 to Weston's Proposal to Provide Environmental Consulting Services	1
32	01/22/97	Bulloff, A.; Kadish, Hinkel & Weibel	Steadman, P. & J. Cahn; U.S. EPA	Letter re: Foundry Sales & Supply's Intention to Remediate the GHR Foundry Site w/Attachments	12

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33	01/31/97	Cahn, J., U.S. EPA	Bulloff, A.; Kadish, Hinkel & Weibel/ Foundry Sales & Supply, Inc.	Cover Letter Forwarding Proposed Administrative Order by Consent for the GHR Foundry Site	2
34	02/06/97	Dempsey, D., Dayton Daily News	Public	Newspaper Article: Company to Pay for GHR Cleanup	2
35	02/07/97	Dayton Daily News	Public	Newspaper Editorial: Foundry Cleanup Starts Once More	1
36	02/25/97	Muno, W., U.S. EPA	Bulloff, A.; Kadish, Hinkel & Weibel/ Foundry Sales & Supply, Inc.	Administrative Order by Consent re: the GHR Foundry Site w/Cover Letter	25
37	02/27/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Notification to U.S. EPA that Weston Has Been Retained by Foundry Sales & Supply as the Contractor for On-Site Action at the GHR Foundry Site	1
38	03/05/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Cover Letter Forwarding Draft Work Plan for the GHR Foundry Site	1
39	03/24/97	Steadman, P., U.S. EPA	Buchan, T., Ohio EPA and D. Hall, City of Dayton	Letter re: U.S. EPA's Request for OEPA/City of Dayton's Comments on the Draft Removal Action Work Plan for the GHR Foundry Site	2
40	04/07/97	Buchan, T. and D. Jancuk; Ohio EPA	Steadman, P., U.S. EPA	Letter re: OEPA's General Comments on the Draft Removal Action Work Plan for the GHR Foundry Site	3

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41	04/07/97	Hall, D., City of Dayton	Steadman, P., U.S. EPA	Letter re: City of Dayton's Comments on the Draft Removal Action Work Plan for the GHR Foundry Site	1
42	04/09/97	Steadman, P., U.S. EPA	Carcione, R., Foundry Sales & Supply, Inc.	Letter re: U.S. EPA's Technical Review Comments on the March 5, 1997 Draft Removal Action Work Plan for the GHR Foundry Site	7
43	04/24/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Revisions to the Removal Action Work Plan for the GHR Foundry Site	7
44	04/29/97	Bartley, J., Roy F. Weston, Inc.	Cahn, J. and P. Steadman; U.S. EPA	FAX Transmission re: Signage for the GHR Foundry Site	2
45	04/29/97	Steadman, P., U.S. EPA	Carcione, R., Foundry Sales & Supply, Inc.	Letter re: U.S. EPA's Notice of Intent to Approve the Removal Action Work Plan for the GHR Foundry Site	2
46	04/24/97	Roy F. Weston, Inc.	U.S. EPA	Removal Action Work Plan for the GHR Foundry Site	162
47	05/05/97	Steadman, P., U.S. EPA	Nabasny, G., U.S. EPA	Memorandum re: START Contractor Oversight TDD Request for Removal Action at the GHR Foundry Site	5
48	05/07/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Notification of Field Activity at the GHR Foundry Site	3
49	05/12/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Scheduled Field Activity at the GHR Foundry Site	5
50	05/19/97	Roy F. Weston, Inc.	U.S. EPA	Revised Removal Action Work Plan for the GHR Foundry Site	184

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51	06/03/97	Steadman, P., U.S. EPA	Distribution List	Initial Pollution Report (POLREP) for the GHR Foundry Site	3
52	06/04/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Monthly Progress Report #1 for May 1997 for the GHR Foundry Site	5
53	06/06/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Prevention of Off-Site Migration of Soil and Debris from the GHR Foundry Site	4
54	06/13/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Debris Removal Schedule Delay at the GHR Foundry Site	2
55	06/25/97	Sherrard, J., Ecology and Environment, Inc.	Steadman, P., U.S. EPA	Memorandum re: PRP Oversight Monthly Report #1 for the Period May 23- June 24, 1997 for the GHR Foundry Site	3
56	07/07/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Monthly Progress Report #2 for June 1997 for the GHR Foundry Site	5
57	07/25/97	Sherrard, J., Ecology and Environment, Inc.	Steadman, P., U.S. EPA	Memorandum re: PRP Oversight Monthly Report #2 for the Period June 25- July 25, 1997 for the GHR Foundry Site	1
58	07/31/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Monthly Progress Report #3 for July 1997 for the GHR Foundry Site	5
59	08/08/97	Sherrard, J., Ecology and Environment, Inc.	Steadman, P., U.S. EPA	Memorandum re: PRP Oversight August 4, 1997 Trip Report for the GHR Foundry Site	1
60	08/08/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: Site Security Services for the GHR Foundry Site	1
61	08/14/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Letter re: PCB Soil at the GHR Foundry Site	2

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62	08/27/97	White, B., Roy F. Weston, Inc.	Baker, J., City of Dayton	Letter re: Nuisance Abatement Timetable for the GHR Foundry Site	3
63	09/08/97	White, B., Roy F. Weston, Inc.	Steadman, P., U.S. EPA	Monthly Progress Report #4 for August 1997 for the GHR Foundry Site	3
64	10/00/97	U.S. EPA	Public	Fact Sheet: GHR Foundry Site	4
65	00/00/00	Steadman, P., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Determination of Threat to Public Health and the Environment at the GHR Foundry Site (PENDING)	